

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

CARPENTERS' DISTRICT COUNCIL OF)
GREATER ST. LOUIS AND VICINITY, et al.,)
Plaintiffs,)
v.) Case No. 4:06CV1673-CAS
F.G. LANCIA CUSTOM WOODWORKING, LLC)
and FRANK LANCIA, an individual,)
Defendants.)

**MOTION FOR A CREDITOR'S BILL IN EQUITY
AND TO PIERCE THE CORPORATE VEIL**

Pursuant to Rule 69(a) of the Federal Rules of Civil Procedure and pursuant to the established procedures of the State of Missouri relating to proceedings in aid of execution, plaintiffs move the Court for equitable relief in the form of a creditor's bill to allow the plaintiffs to proceed to satisfy the judgments entered in this case against Frank Lancia and F.G. Lancia Custom Woodworking, LLC, which are not subject to execution by normal means available at law.

The plaintiffs further move the court to pierce the corporate veil of Frank Lancia and F.G. Lancia Custom Woodworking, LLC, and permit the plaintiffs to satisfy the judgment from their alter ego: F.G.L. Woodworking and Audio-Video, Inc.

Plaintiffs have no adequate legal remedy. Further grounds supporting the use of a creditor's bill and piercing the corporate veil are set forth in the accompanying memorandum of law.

Respectfully submitted,

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/s/ Michael A. Evans
GREG A. CAMPBELL, #2774
MICHAEL A. EVANS, #534636

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2009 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Greg O'Shea
779 Lemay Ferry Road
St. Louis, MO 63125

Additionally, I hereby certify that on August 28, 2009 the foregoing was mailed to the following non-participant in electronic filing:

Frank Lancia
303 High Meadows
Ballwin, MO 63011

F.G. Lancia Custom Woodworking, LLC
813 N Skinker Blvd
Saint Louis, MO 63130

F.G.L. Woodworking and Audio-Video, Inc.
813 N Skinker Blvd
Saint Louis, MO 63130

F.G.L. Woodworking and Audio-Video, Inc.
106 Clear Meadows Drive
Ballwin MO 63011

/s/ Michael A. Evans